

LAW OFFICE OF
MICHAEL K. BACHRACH
276 FIFTH AVENUE, SUITE 501
NEW YORK, N.Y. 10001

TEL. (212) 929-0592 • FAX. (866) 328-1630

MICHAEL K. BACHRACH *

* admitted in N.Y., MN and D.C.

<http://www.mbachlaw.com>

michael@mbachlaw.com

January 22, 2016

By ECF and by email

AUSA Robert Frazer
Office of the U.S. Attorney
District of New Jersey
970 Broad Street, Suite 700
Newark, New Jersey 07102

***Re: United States v. Farad Roland, et al.,
12 Cr. 298 (ES) (D.NJ)***

Dear Mr. Frazer:

It has been brought to our attention that the Government may be operating under the belief that a request for discovery from any individual member of Farad Roland's defense team is simply from *that* attorney and not from all counsel of record for Mr. Roland. Such would explain, for example, why the Government has not responded to all of the discovery requests previously submitted by Donna Newman, and may also be why the Government has yet to respond to all of Thomas Ambrosio's discovery requests.

To ensure that there is no confusion, please be advised that the Government should infer that all discovery requests made by any individual attorney representing Mr. Roland in this case, should be received as a request from all defense counsel for Mr. Roland. Substitution of counsel should not be interpreted as a nullification of a request. Thus, any previous discovery request filed by Ms. Newman, Mr. Ambrosio, Richard Jasper, or Michael Bachrach, should be received as a request made by all defense counsel for Mr. Roland, and the same principle holds true for any future discovery requests made in this case irrespective of the composition of Mr. Roland's defense team.

In light of this clarification, within 10 days please comply with all outstanding discovery demands made by defense counsel in this case, irrespective if that request was made by Ms. Newman, Mr. Ambrosio, Mr. Jasper, Mr. Bachrach, or their staffs, and regardless if the request was made pursuant to Rule 16, Brady, Giglio, Kyles, or any other basis for discovery.

Thank you for your time and assistance. We hope this resolves any misplaced beliefs that the Government may have been operating under. If you have any questions or if you require additional time to comply, please call us to discuss the matter further.

AUSA Robert Frazer

January 22, 2016

Page 2 of 2

Yours sincerely,

A handwritten signature in black ink, appearing to read 'MBR', with a long horizontal flourish extending to the right.

Michael K. Bachrach

Richard Jasper

Thomas Ambrosio

Attorneys for Defendant Farad Roland

cc: AUSA Robert Feitel (by ECF)
AUSA Courtney Howard (by ECF)